



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



FEB 13 2012

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # S-377**  
**Project # S-1110837**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Paramount Farms, Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-377-49-2 into the Title V operating permit. Paramount Farms has proposed increasing daily VOC and PM10 emissions limits and to change the coating application method.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-377-49-2, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



**FEB 13 2012**

Daniel Lee  
Paramount Farms, Inc.  
13646 Highway 33  
Lost Hills, CA 93249-9719

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-377  
Project # S-1110837**

Dear Mr. Lee:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-377-49-2 into the Title V operating permit. Paramount Farms has proposed increasing daily VOC and PM10 emissions limits and to change the coating application method.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-377-49-2, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

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Tel: 661-392-5500 FAX: 661-392-5585

## **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: S-1110837

Engineer: Kris Rickards  
Date: February 9, 2012

Facility Number: S-377  
Facility Name: Paramount Farms, Inc.  
Mailing Address: 13646 Highway 33  
Lost Hills, Ca 93249-9719

*Reviewed by AP ~~SWP~~ ARE*

FEB 09 2012

Contact Name: Daniel Lee  
Phone: 661-797-6505

Responsible Official: Dave Szefflin  
Title: Vice President of Operations

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### **I. PROPOSAL**

Paramount Farms, Inc. is proposing a Title V minor permit modification to incorporate the recently issued S-377-49-2 into the Title V operating permit.

Paramount Farms, Inc. has requested to change from electrostatic coating to a High Volume Low Pressure (HVLP) gun application and increase daily VOC and PM10 emissions limits associated with an increase in daily coating.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### **II. FACILITY LOCATION**

The facility is located at 13646 Highway 33 in Lost Hills, CA.

### III. EQUIPMENT DESCRIPTION

**S-377-49-2:** COATING OPERATION FOR CARBON STEEL SUBSTRATES USING HVLP SPRAY GUN, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AND AN ENCLOSED GUN CLEANER

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Condition 4 on the current Permit to Operate was modified as follows to allow the increase in daily VOC emissions and specify the annual VOC limit and appears as condition 4 on the draft Permit to Operate:

- VOC emissions from the coating operation shall not exceed ~~5.9 pounds in any one day~~ 23.7 lb/day or 1,539 lb/year. [District Rule 2201]

Condition 5 on the current Permit to Operate was modified as follows to allow the increase in daily PM<sub>10</sub> emissions and specify the annual PM<sub>10</sub> limit and appears as condition 5 on the draft Permit to Operate:

- Particulate matter (PM<sub>10</sub>) emission rate (including painting and priming) shall not exceed ~~4.55.8 lb/day~~ or 376 lb/year. [District Rule 2201]

Condition 6 on the current Permit to Operate was modified as follows to allow an increase in daily coating operational hours and appears as condition 6 on the draft Permit to Operate:

- The metal parts and products coating operation shall not be operated more than ~~8~~ 16 hours/day. [District Rule 2201]

Condition 8 on the draft Permit to Operate was added to enforce HVLP gun performance requirements:

- Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603]

Condition 10 on the draft Permit to Operate was added to enforce VOC limits:

- VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4603]

Condition 9 on the current Permit to Operate was modified as follows to enforce new Rule 4603 VOC content limits and appears as condition 11 on the draft Permit to Operate:

- Cleaning activities that use solvents with a VOC content greater than ~~50~~25 g/l (~~0.42~~0.21 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4603]

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and

- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
- 5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

- 1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- 2. The source's suggested draft permit; and
- 3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. S-377-49-3
- B. Authorities to Construct No. S-377-49-2
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. S-377-49-1

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(S-377-49-3)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-377-49-3

**EXPIRATION DATE:** 10/31/2016

**EQUIPMENT DESCRIPTION:**

COATING OPERATION FOR CARBON STEEL SUBSTRATES USING ELECTROSTATIC SPRAY GUN, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AND AN ENCLOSED GUN CLEANER

## PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. VOC emissions from the coating operation shall not exceed 23.7 lb/day or 1,539 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Particulate matter (PM10) emission rate (including painting and priming) shall not exceed 5.8 lb/day or 376 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The metal parts and products coating operation shall not be operated more than 16 hours/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603] Federally Enforceable Through Title V Permit
8. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603] Federally Enforceable Through Title V Permit
9. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed the following limit: air-dried coating: 340 g/l (2.8 lb/gal). [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
10. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.



11. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4603] Federally Enforceable Through Title V Permit
12. All painting, including application of primer, shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall not use VOC containing materials to clean spray equipment unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4603] Federally Enforceable Through Title V Permit
14. The permittee shall dispose the fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty [District Rule 4603] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: hours of operation of the coating operation and use of the natural gas-fired drying burner; volume of coatings applied; VOC content of each coating as applied; and purchase and usage of each specific solvent, showing the date, type and volume purchased or used. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
17. The material safety data sheets (MSDS) that display VOC content of each coating used shall be kept on the premise at all times [District Rule 4603] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# ATTACHMENT B

Authority to Construct No.  
(S-377-49-2)

# AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-377-49-2

**ISSUANCE DATE:** 03/15/2011

**LEGAL OWNER OR OPERATOR:** PARAMOUNT FARMS

**MAILING ADDRESS:** ATTN: DANIEL LEE  
13646 HIGHWAY 33  
LOST HILLS, CA 93249-9719

**LOCATION:** 3.5 MILES NORTH OF HWY 46 ON HWY 33  
LOST HILLS, CA

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF COATING OPERATION FOR CARBON STEEL SUBSTRATES USING ELECTROSTATIC SPRAY GUN, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AND AN ENCLOSED GUN CLEANER: INCREASE DAILY COATING USAGE LIMITS AND CHANGE COATING APPLICATION METHOD TO HVLP

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. VOC emissions from the coating operation shall not exceed 23.7 lb/day or 1,539 lb/year. [District Rule 2201]
6. Particulate matter (PM10) emission rate (including painting and priming) shall not exceed 5.8 lb/day or 376 lb/year. [District Rule 2201]
7. The metal parts and products coating operation shall not be operated more than 16 hours/day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

8. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603]
10. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed the following limit: air-dried coating: 340 g/l (2.8 lb/gal). [District Rules 2201 and 4603]
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4603]
12. Cleaning activities that use solvents with a VOC content greater than 25 g/l (0.21 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4603]
13. All painting, including application of primer, shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall not use VOC containing materials to clean spray equipment unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4603] Federally Enforceable Through Title V Permit
15. The permittee shall dispose the fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty [District Rule 4603] Federally Enforceable Through Title V Permit
16. Permittee shall maintain daily records of the following: hours of operation of the coating operation and use of the natural gas-fired drying burner; volume of coatings applied; VOC content of each coating as applied; and purchase and usage of each specific solvent, showing the date, type and volume purchased or used. [District Rules 2201 and 4603]
17. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rules 2201 and 4603]
18. The material safety data sheets (MSDS) that display VOC content of each coating used shall be kept on the premise at all times [District Rule 4603] Federally Enforceable Through Title V Permit
19. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4603]

# ATTACHMENT C

## Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-377-49	0	0	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application


# San Joaquin Valley Air Pollution Control District

[www.valleyair.org](http://www.valleyair.org)

RECEIVED  
MAR 22 2011  
SJVAPCD  
Southern Region

## Permit Application For:

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Paramount Farms Inc.	
2. MAILING ADDRESS:  STREET/P.O. BOX: 13646 Highway 33  CITY: Lost Hills STATE: CA 9-DIGIT ZIP CODE: 93249-9719	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: 13646 Highway 33 CITY: Lost Hills  NE ¼ SECTION 23 TOWNSHIP 26S RANGE 19E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Nut Processing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Modify Title V permit to incorporate the following ATC:  S-377-49-02.	
6. TYPE OR PRINT NAME OF APPLICANT:  Daniel Lee	TITLE OF APPLICANT:  Technical Services Manager
7. SIGNATURE OF APPLICANT:  	DATE: 3-21-2011  PHONE: (661) 797-6505 FAX: (661) 797-6542 EMAIL: dlee@paramountfarms.com

For APCD Use Only:

NO\$

DATE STAMP	FILING FEE RECEIVED: \$	CHECK#:
	DATE PAID:	
	PROJECT NO: S-1110837	FACILITY ID: S-377

Title V - Minor Mod



**San Joaquin Valley  
Unified Air Pollution Control District**

RECEIVED  
MAR 22 2011  
SJVAPCD  
Southern Region

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- ☐ SIGNIFICANT PERMIT MODIFICATION      ☐ ADMINISTRATIVE AMENDMENT  
☒ MINOR PERMIT MODIFICATION

COMPANY NAME: <b>Paramount Farms, Inc.</b>	FACILITY ID: <b>S - 377</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION** (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

3/21/11  
\_\_\_\_\_  
Date

Dave Szefflin  
\_\_\_\_\_  
Name of Responsible Official (please print)

Vice President of Operations  
\_\_\_\_\_  
Title of Responsible Official (please print)

Implement ATC # S-377-49-2 into Title V Permit.

# ATTACHMENT E

Previous Title V Operating Permit No.  
(S-377-49-1)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-377-49-1

**EXPIRATION DATE:** 10/31/2016

**EQUIPMENT DESCRIPTION:**

COATING OPERATION FOR CARBON STEEL SUBSTRATES USING ELECTROSTATIC SPRAY GUN, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AND AN ENCLOSED GUN CLEANER

## PERMIT UNIT REQUIREMENTS

---

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. VOC emissions from the coating operation shall not exceed 5.9 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Particulate matter (PM10) emission rate (including painting and priming) shall not exceed 1.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The metal parts and products coating operation shall not be operated more than 8 hours/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603] Federally Enforceable Through Title V Permit
8. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed the following limit: air-dried coating: 340 g/l (2.8 lb/gal). [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4603] Federally Enforceable Through Title V Permit
10. All painting, including application of primer, shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Permittee shall not use VOC containing materials to clean spray equipment unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4603] Federally Enforceable Through Title V Permit
12. The permittee shall dispose the fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty [District Rule 4603] Federally Enforceable Through Title V Permit
13. Permittee shall maintain daily records of the following: hours of operation of the coating operation and use of the natural gas-fired drying burner; volume of coatings applied; VOC content of each coating as applied; and purchase and usage of each specific solvent, showing the date, type and volume purchased or used. [District Rule 4603] Federally Enforceable Through Title V Permit
14. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4603] Federally Enforceable Through Title V Permit
15. The material safety data sheets (MSDS) that display VOC content of each coating used shall be kept on the premise at all times [District Rule 4603] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.